



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

No. 3:22-CR-00327
JUDGE TRAUGER

[1] CHESTER GALLAGHER

[2] HEATHER IDONI

[3] CALVIN ZASTROW

[4] COLEMAN BOYD

[7] DENNIS GREEN

MOTION REQUESTING LEAVE OF COURT
TO FILE EX PARTE AND SEALED DOCUMENT

Comes now the Defendant, Chester Gallager, Heather Idoni, Calvin Zastrow, Coleman Boyd and Dennis Green, by and through undersigned CJA appointed counsel, pursuant to Title 18 U.S.C. section 3006A which provides for an *ex parte* application, and hereby requests leave of this Honorable Court to file a sealed motion for this Court's review. Counsel for the above listed Defendants submit that the motion is properly filed under seal and that the law specifically provides that the sealed motion be filed *ex parte*. Counsel further represents to this Court that she **will not serve** a copy of the *under seal* document on the government or codefendant Vaughn's counsel.